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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI

VEDRAN KUSTURICA

Plaintiff,

v.

JHPDE FINANCE 1; EXPERIAN INFORMATION SOLUTIONS, INC.; and TRANS UNION, LLC,

Defendants.

Case No. 4:22-cv-00517 Honorable John A. Ross

DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD

Defendant Experian Information Solutions, Inc. ("Experian"), by and through its undersigned counsel, respectfully moves this Court for an order extending Experian's time to answer or otherwise plead up to and including June 27, 2022. In support of this Motion, Experian states as follows:

- 1. Plaintiff Vedran Kusturica ("Plaintiff") filed his Complaint against Experian on or about May 11, 2022.
- 2. Plaintiff served Experian with an executed Summons on May 16, 2022, such that Experian is ostensibly obligated to answer or otherwise plead by June 6, 2022.
- 3. Plaintiff alleges that Experian violated the Fair Credit Reporting Act, 15 U.S.C. § 1681 *et seq.*, and that Experian is therefore liable to Plaintiff under the same.
- 4. Experian desires additional time to review the Complaint, investigate its allegations, and prepare an appropriate response.

5. Experian now seeks an order from this Court extending Experian's time to answer or otherwise plead up to and including June 27, 2022, so that Experian may investigate the allegations of the Complaint and prepare an appropriate response.

- 6. This is the first request for additional time sought by Experian in this action.
- 7. This extension is sought in good faith and not for the purposes of delay. Neither party will be prejudiced by this extension.
- 8. Experian's counsel communicated with Plaintiff's counsel via email regarding the relief requested herein. Plaintiff's counsel confirmed that Plaintiff does not oppose this motion for extension of time to answer or otherwise plead.

WHEREFORE, for the foregoing reasons, Defendant Experian Information Solutions, Inc. respectfully requests that this Court extend its time to answer or otherwise plead until June 27, 2022.

Dated May 26, 2022.

Respectfully submitted,

/s/ G. Edgar James

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Counsel for Experian Information Solutions, Inc.

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CERTIFICATE OF SERVICE

I hereby certify that on May 26, 2022, a copy of the foregoing was filed using the CM/ECF system, which will effectuate service on all counsel of record.

/s/ G. Edgar James

Counsel for Experian Information Solutions, Inc.